

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

HAROLD LIFF,

Plaintiff

v.

Civil Action No. 05-11672-WGY

LIBERTY MUTUAL INSURANCE
COMPANY, aka LIBERTY LIFE
ASSURANCE COMPANY OF BOSTON, THE
AMERISOURCE BERGEN CORPORATION
LONG TERM DISABILITY PLAN, and
AMERISOURCEBERGEN CORPORATION,
aka AMERISOURCEBERGEN DRUG
CORPORATION

Defendants

**ASSENTED TO MOTION TO EXTEND TIME TO ANSWER OR
OTHERWISE RESPOND TO COMPLAINT**

Defendant, Liberty Life Assurance Company of Boston¹, respectfully requests, and with the assent of the Plaintiff, that it be granted a brief extension of time to answer or otherwise respond to Plaintiff's Complaint, up to and including Tuesday, September 27, 2005. As grounds for this motion, Defendant states that additional time is needed to review the documents in this case and investigate Plaintiff's claims brought under the Employee Retirement Income Security Act ("ERISA"), 29 U.S.C. §1001 *et seq.*, in order to adequately answer or otherwise respond to the Complaint.

On behalf of Defendant, the undersigned counsel has conferred with Katherine Sullivan, counsel for Plaintiff, who has given his assent on behalf of Plaintiff.

¹ Incorrectly named as Liberty Mutual Insurance Company aka Liberty Life Assurance Company of Boston.

WHEREFORE, Defendant respectfully requests that it be granted an extension of time, up to and including September 27, 2005, to answer or otherwise respond to the Complaint.

Respectfully submitted,

LIBERTY LIFE ASSURANCE COMPANY OF
BOSTON,
By its attorneys,

/s/ Richard W. Paterniti
Andrew C. Pickett, BBO# 549872
Richard W. Paterniti, BBO#645170
Jackson Lewis LLP
75 Park Plaza
Boston, MA 02116
(617) 367-0025

August 30, 2005

ASSENTED TO AND AGREED TO BY: /s/ M. Katherine Sullivan (RWP)
M. Katherine Sullivan, BBO# 058640
LAW OFFICE OF MARK BORNSTEIN
288 Walnut Street, Suite 120
Newton, MA 02458
617-244-5551

CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2005, a copy of the foregoing was served by first class mail on Plaintiff's counsel, Mark Bornstein and Katherine Sullivan, LAW OFFICE OF MARK BORNSTEIN, 288 Walnut Street, Suite 120, Newton, MA 02458.

/s/ Richard W. Paterniti

Jackson Lewis LLP